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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

Judge Paul G. Cassell

DECK TYPE: Criminal

UNITED STATES OF AMERICA,

DATE STAMP: 04/20/2005 @ 08:32:30

CASE NUMBER: 2:05CR00251 PGC

Plaintiff, :

INDICTMENT

VS.

ANDREW KIMBALL WRIGHT : VIO: 18 U.S.C. 2422(b),

: Coercion and Enticement For Illegal

Sexual Activity; 18 U.S.C. 2425, Use of

Defendant. : Interstate Facility to Transmit

Information about a Minor

The Grand Jury charges:

COUNT I (18U.S.C. 2422(b))

On or about March 31, 2005 in the Central Division of the District of Utah,

ANDREW KIMBALL WRIGHT,

the defendant herein, did knowingly and intentionally, by means of a facility of interstate commerce, persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in sexual activity for which a person can be charged with a criminal offense, or attempted to so persuade, induce, entice, and coerce; all violation of Title 18, United States Code, Section 2422(b).

The Grand Jury charges:

COUNT II (18 U.S.C. 2425)

On or about March 31, 2005, in the Central Division of the District of Utah,

ANDREW KIMBALL WRIGHT

the defendant herein, did using the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, did knowingly initiate a the transmission of the name, address, telephone number, social security number, or electronic mail address of another individual, knowing that such other individual has not attained the age of 16 years, with the intent to entice, encourage, offer, or solicit any person to engage in sexual activity for which any person can be charged with a criminal offense, or attempted to do so; all in violation of Title 18, United States

Code, Section 2425.

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

PAUL M. WARNER

United States Attorney

KARIN M. FOJTIK

Assistant United States Attorney